

EXHIBIT D

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COPY

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

JOHN BALDWIN, LEONARD BELL,
JOHANNES KAINDOH AND WAYNE
HENDERSON, GODWIN ENAGBARE,
And JOE L. WILLIS

Intervenor-Plaintiffs

-against-

WASHINGTON GROUP INTERNATIONAL,
INC., RON BENNETT, MICHAEL FOGARTY,
and DENNIS WOODRUFF,

Defendants

Civil Action No. 04-12097-GAO

NOTICE OF TAKING DEPOSITION OF STEPHEN HANKS

TO:

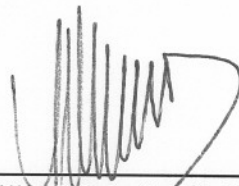
Stephen Paternitti, Esq.
Jackson, Lewis
75 Park Plaza
4th Floor
Boston, MA 02116

Todd J. Bennett, Esq.
Corrigan, Bennett & Belfort, P.C.
24 Thornedike St., Suite 300
Cambridge, MA 02141

Jacques Dessin, Esq.
Dessin & Associates, P.C.
236 Huntington Ave.
Suite 302-302
Boston, MA 02210

PLEASE TAKE NOTICE that at 10:00 AM on December 22, 2006 at the Boston Area Office of the Equal Employment Opportunity Commission, JFK Federal Building, Room 475, Boston, MA, 02203-0506, (617) 565-3200, the Plaintiff will take the deposition upon oral examination of Stephen Hanks pursuant to the Federal Rules of Civil Procedure, before a court reporter, or other competent authority authorized to administer oaths. You are invited to attend and cross examine.

FOR THE PLAINTIFF,
EEOC



R. Liliana Palacios-Baldwin, MA BBO #640786
Senior Trial Attorney
EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
Boston Area Office
John F. Kennedy Federal Building,
Room 475
Boston, MA 02203-0506
(617) 565-3188